

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

RYAN BRESLOW, ALEX FINE, and JON
GORDON,

Plaintiffs,

v.

MARK PHILLIPS and BENJAMIN REED,

Defendants.

Action No.: 23-cv-20727-ALTMAN/Reid

Honorable Roy K. Altman

MOVEMENTDAO and MARK PHILLIPS,

Counterclaim-

Plaintiffs

v.

RYAN BRESLOW, ALEX FINE, and JON
GORDON,

Counterclaim-Defendants

**PLAINTIFFS AND COUNTERCLAIM-DEFENDANTS RYAN BRESLOW, ALEX FINE,
AND JON GORDON'S NOTICE OF FILING PROPOSED ORDER GRANTING
MOTION FOR LEAVE TO FILE EXHIBITS UNDER SEAL**

Plaintiffs and Counterclaim-Defendants Ryan Breslow, Alex Fine, and Jon Gordon (collectively, "Plaintiffs"), through their undersigned counsel, hereby file this Notice Of Filing A Proposed Order. The [Proposed] Order Granting Motion For Leave To File Exhibits Under Seal, if granted, permits Plaintiffs to file under seal: (1) the declaration of Jango.eth, (2) the declaration of Ryan Breslow, and (3) the appended exhibit thereto. The [Proposed] Order Granting Motion For Leave To File Exhibits Under Seal is filed in connection with Plaintiffs' Motion For Leave To File Under Seal (Dkt. No. 111).

Dated: June 9, 2023

John K. Shubin, Esq.
Dylan M. Helfand, Esq.
Jamie L. Katz, Esq.
SHUBIN & BASS, P.A.
150 W Flagler Street, Suite 1420
Miami, FL 33130
Tel.: (305) 381-6060
Fax: (305) 381-9457
Email: jshubin@shubinbass.com
jkatz@shubinbass.com
dhelfand@shubinbass.com

*Attorneys for Plaintiffs Ryan Breslow, Alex
Fine, And Jon Gordon*

/s/ Benjamin J. Kussman
Christopher T. Berg (*pro hac vice pending*)
Benjamin J. Kussman (*pro hac vice pending*)
ELLIS GEORGE CIPOLLONE
O'BRIEN ANNAGUEY LLP
2121 Avenue of the Stars, 30th Floor
Los Angeles, California 90067
(310) 274-7100
Email: cberg@egcfirm.com
bkussman@egcfirm.com

*Attorneys for Plaintiffs Ryan Breslow, Alex
Fine, And Jon Gordon*

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of June 2023, the foregoing was electronically filed with the Clerk of the Court by using CM/ECF system, which will send a notice of electronic filing to authorized CM/ECF files.

Nitoj P. Singh, Esq. (*Pro Hac Vice*)
Jesse D. Franklin-Murdock, Esq. (*Pro Hac Vice*)
Harmeet Dhillon, Esq.
Dhillon Law Group Inc.
177 Post Street, Suite 700
San Francisco, CA 94108
Office: 415-433-1700
Email: nsingh@dhillonlaw.com
jfranklin-murdock@dhillonlaw.com
harmeet@dhillonlaw.com

Attorneys for Defendants Mark
Phillips and Benjamin Reed

Matthew Sarelson, esq.
Dhillon Law Group Inc.
1601 Forum Place, Suite 403
West Palm Beach, Florida 33401
Office: 305.773.1952
Fax: 415.520.6593
Email: msarelson@dhillonlaw.com

/s/ Jamie L. Katz

Attorney